

WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153  
Telephone: (212) 310-8000  
Facsimile: (212) 310-8007  
Jacqueline Marcus

Attorneys for Lehman Brothers Holdings Inc.  
and Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
Debtors.	: (Jointly Administered)
	:
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**TWENTY-EIGHTH NOTICE OF WITHDRAWAL OF DEBTORS'  
APPLICATION TO ASSUME CERTAIN EXECUTORY CONTRACTS**

PLEASE TAKE NOTICE of the following:

1. On October 25, 2011, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed a Plan Supplement (as amended from time to time the “Plan Supplement”) [ECF No. 21254],<sup>1</sup> containing documents and schedules in connection with the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”),<sup>2</sup> dated December 5, 2011 [ECF No. 22973]. The Plan was confirmed by order of the Court on December 6, 2011 (the “Confirmation Order”) [ECF No. 23023] and became effective on March 6, 2012.

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<sup>1</sup> A list of the amendments to the Plan Supplement and other notices and orders pertaining thereto is annexed hereto as Exhibit A.

<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Plan.

2. Pursuant to the Confirmation Order, the hearing on the Debtors' proposed assumption of certain executory contracts and unexpired leases set forth on Exhibit 2 to the Plan Supplement was adjourned until (i) February 14, 2012, or (ii) such other date as may be scheduled by the Debtors, with leave from the Court, with at least 30 days' notice to the relevant counterparty, or as otherwise agreed.

3. On January 31, 2012, February 9 and 13, 2012, April 3, 2012, May 31, 2012, June 25, 2012, August 14, 2012, October 19, 2012, November 16, 2012, December 4, 2012, February 8, 2013, March 8, 2013, June 27, 2013, October 28, 2013, February 24, 2014, June 17, 2014, July 17, 2014, October 13, 2014, January 29, 2015, March 2, 2015, June 3, 2015, July 23, 2015, September 30, 2015, February 4, 2016, March 7, 2016, October 11, 2016, and February 6, 2017, the Debtors filed notices of withdrawal of their application to assume certain executory contracts or to defer indefinitely the hearing on their application to assume certain executory contracts.

4. The Debtors hereby withdraw their application to assume the executory contracts identified on Exhibit B hereto (the "Withdrawn Contracts").

5. The Debtors reserve their rights to withdraw in the future their application to assume additional executory contracts and unexpired leases set forth on

Schedule 1 or 2 to the Confirmation Order or that are the subject of the objections listed on  
Schedule 1 or 2 to the Confirmation Order.

Dated: December 6, 2017  
New York, New York

/s/ Jacqueline Marcus  
Jacqueline Marcus

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New York, New York 10153  
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**EXHIBIT A**

**AMENDMENTS TO THE PLAN SUPPLEMENT AND OTHER NOTICES AND  
ORDERS PERTAINING THERETO**

1. Amendment No. 1 to the Plan Supplement, filed on November 4, 2011 [ECF No. 21665].
2. Amendment No. 2 to the Plan Supplement, filed on November 15, 2011 [ECF No. 22156].
3. Amendment No. 3 to the Plan Supplement, filed on November 22, 2011 [ECF No. 22590].
4. Amendment No. 4 to the Plan Supplement, filed on November 29, 2011 [ECF No. 22742].
5. Amendment No. 5 to the Plan Supplement, filed on December 2, 2011 [ECF No. 22876].
6. Amendments No. 6 and No. 7 to the Plan Supplement, filed on December 5, 2011 [ECF Nos. 22975 and 22980].
7. Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on January 31, 2012 [ECF No. 24823].
8. Notice of (i) Withdrawal of Debtors' Application to Assume Certain Executory Contracts, (ii) Indefinite Adjournment of Debtors' Application to Assume Certain Executory Contracts, (iii) Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, and (iv) Status Conference on Debtors' Proposed Assumption of Executory Contracts, filed on February 9, 2012 [ECF No. 25201].
9. Third Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 13, 2012 [ECF No. 25266].
10. Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, entered by the Court on March 19, 2012 [ECF No. 27016].
11. Fourth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on April 3, 2012 [ECF No. 27262].
12. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on April 4, 2012 [ECF No. 27272].
13. Fifth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on May 31, 2012 [ECF No. 28313].
14. Notice of Presentment of Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, filed on May 31, 2012 [ECF No. 28326].
15. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 19, 2012 [ECF No. 28871].
16. Sixth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on June 25, 2012 [ECF No. 28956].

17. Corrected Sixth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on June 25, 2012 [ECF No. 28957].
18. Seventh Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on August 14, 2012 [ECF No. 30026].
19. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on September 12, 2012 [ECF No. 30894].
20. Order Authorizing Debtors to Assume Certain Executory Contract, entered by the Court on September 28, 2012 [ECF No. 31130].
21. Eighth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 19, 2012 [ECF No. 31569].
22. Ninth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on November 16, 2012 [ECF No. 32144].
23. Order Authorizing Debtors to Assume Certain Executory Contracts, entered by the Court on November 28, 2012 [ECF No. 32382].
24. Tenth Notice of Withdrawal or Deferral of Debtors' Application to Assume Certain Executory Contracts, filed on December 4, 2012 [ECF No. 32574].
25. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 4, 2012 [ECF No. 32576].
26. Eleventh Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 8, 2013 [ECF No. 34503].
27. Twelfth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 8, 2013 [ECF No. 35786].
28. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on March 14, 2013 [ECF No. 35924].
29. Order Authorizing Debtors to Assume Certain Executory Contracts, entered by the Court on March 19, 2013 [ECF No. 36058].
30. Thirteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 27, 2013 [ECF No. 38227].
31. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on July 3, 2013 [ECF No. 38404].

32. Notice of Corrected Exhibit with Respect to Thirteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 12, 2013 [ECF No. 38686].
33. Notice of Corrected Exhibit with Respect to Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on July 15, 2013 [ECF No. 38714].
34. Order Authorizing Debtors to Assume Certain Executory Contracts and Unexpired Leases, entered by the Court on August 28, 2013 [ECF No. 39883].
35. Fourteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 28, 2013 [ECF No. 40762].
36. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 28, 2013 [ECF No. 40767].
37. Fifteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 24, 2014 [ECF No. 43288].
38. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on March 5, 2014 [ECF No. 43430].
39. Sixteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 17, 2014 [ECF No. 44752].
40. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 17, 2014 [ECF No. 44753].
41. Seventeenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 17, 2014 [ECF No. 45202].
42. Eighteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 13, 2014 [ECF No. 46494].
43. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 13, 2014 [ECF No. 46495].
44. Nineteenth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on January 29, 2015 [ECF No. 47999].
45. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on January 29, 2015 [ECF No. 48000].
46. Twentieth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 2, 2015 [ECF No. 48680].
47. Twenty-First Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on June 3, 2015 [ECF No. 49904].

48. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 5, 2015 [ECF No. 49915].
49. Twenty-Second Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on July 23, 2015 [ECF No. 50413].
50. Twenty-Third Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on September 30, 2015 [ECF No. 51013].
51. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on September 30, 2015 [ECF No. 51014].
52. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on November 23, 2015 [ECF No. 51530].
53. Twenty-Fourth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on February 4, 2016 [ECF No. 51959].
54. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on February 4, 2016 [ECF No. 51960].
55. Twenty-Fifth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on March 7, 2016 [ECF No. 52262].
56. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 6, 2016 [ECF No. 52979].
57. Twenty-Sixth Notice of Withdrawal of Debtors' Application to Assume Certain Executory Contracts, filed on October 11, 2016 [ECF No. 53776].
58. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on October 11, 2016 [ECF No. 53777].
59. Twenty-Seventh Notice of Withdrawal of Debtors' Application of Assume Certain Executory Contracts, filed on February 6, 2017 [ECF No. 54708].
60. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on February 6, 2017 [ECF No. 54709].
61. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on June 13, 2017 [ECF No. 55536].
62. Notice of Adjournment of Hearing on Debtors' Application to Assume Certain Executory Contracts, filed on December 5, 2017 [ECF No. 57087].



**EXHIBIT B**

**WITHDRAWN CONTRACTS**

Counterparty	Debtor	Title of Agreement	Notice Address
GMAC MORTGAGE, LLC (F/K/A GMAC MORTGAGE CORPORATION)	LEHMAN CAPITAL, A DIVISION OF LEHMAN BROTHERS HOLDINGS INC.	<p>(1) GMAC MORTGAGE CORPORATION (AS SERVICER), AURORA LOAN SERVICES LLC (AS MASTER SERVICER) AND LEHMAN CAPITAL, A DIVISION OF LEHMAN BROTHERS HOLDINGS INC. (AS OWNER), FLOW SERVICING AGREEMENT, DATED AS OF MAY 1, 2006</p> <p>(2) GMAC MORTGAGE, LLC (AS SERVICER) AND LEHMAN BROTHERS HOLDINGS INC. (AS OWNER) FLOW SUBSERVICING AGREEMENT, DATED AS OF FEBRUARY 28, 2008</p> <p>(3) GMAC MORTGAGE CORPORATION (AS SERVICER) AND LEHMAN CAPITAL, A DIVISION OF LEHMAN BROTHERS HOLDINGS INC. (AS OWNER), FLOW SUBSERVICING AGREEMENT, DATED AS OF JANUARY 1, 2005</p>	GMAC MORTGAGE, LLC 3451 HAMMOND AVE WATERLOO, IA 50702 ATTENTION: CURTIS SCHARES GMAC MORTGAGE, LLC 200 RENAISSANCE DRIVE DETROIT, MI 48265 ATTN: TRICIA DENNIS

Counterparty	Debtor	Title of Agreement	Notice Address
ANTHRACITE INVESTMENTS (IRELAND) PLC	LEHMAN BROTHERS SPECIAL FINANCING INC.		<p>ANTHRACITE INVESTMENTS (IRELAND) PLC AIB INTERNATIONAL CENTRE IFSC DUBLIN 1 IRELAND</p> <p>NORTH CHURCH STREET PO BOX 1109 GT GRAND CAYMAN, CAYMAN ISLANDS STRATHVALE HOUSE NORTH CHURCH STREET PO BOX 1109 GT GRAND CAYMAN, CAYMAN ISLANDS ATTN: THE DIRECTORS</p> <p>CNP C/O CLIFFORD CHANCE US LLP 31 WEST 52ND STREET, NEW YORK, NY 10019 ATTN: JENNIFER DEMARCO SARAH N. CAMPBELL</p>
ANTHRACITE BALANCE COMPANY (DIS 1) LTD.	LEHMAN COMMERCIAL PAPER INC.		<p>AIB INTERNATIONAL CENTRE I.F.S.C DUBLIN, 1 IRELAND ATTN: THE DIRECTORS</p>